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UBER TECHNOLOGIES, INC.
16 and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,
21 Plaintiff,
22 v.
23 UBER TECHNOLOGIES, INC.,
24 OTTOMOTTO LLC; OTTO TRUCKING LLC,
25 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF DEFENDANT
OTTO TRUCKING LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF
ITS MOTION TO EXCLUDE REPORT
AND TESTIMONY OF DR.
LAMBERTUS HESSELINK AND
WAYMO'S OPPOSITION THERETO
(DKT. 2014)**

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking LLC's Administrative Motion to File Under Seal Portions of Its Motion to Exclude Report and Testimony of Dr. Lambertus Hesselink and Waymo's Opposition Thereto (Dkt. 2014).

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 1 to Lin Declaration	Entire Document
Exhibit 2 to Lin Declaration	Entire Document

3. The entirety of Exhibits 1 and 2 to the Lin Declaration are Waymo expert Dr. Lambertus Hesselink's opening and reply expert reports, which contain highly confidential information regarding the technical information of Uber's LiDAR system and statistics relating to Uber's self-driving car program. This information is not publicly known, and its confidentiality is strictly maintained. I understand that disclosure of this information would allow competitors and counterparties to acquire detailed knowledge of Uber's technical designs and self-driving car development, allowing them to tailor their own development to the detriment of Uber.

4. Defendants' request to seal is narrowly tailored to the portions of Otto Trucking's Motion and its supporting papers that merit sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of October, 2017 in Washington, District of Columbia.

/s/ Michelle Yang

Michelle Yang

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ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: October 20, 2017

/s/ Arturo J. Gonzalez
ARTURO J. GONZALEZ